

Blueriver Networking Services, Inc.

200 N Main St
Salem, IN 47167

Marlene H. Dortch, Secretary
Federal Communications Commission

RE: GN Docket No. 12-354, RM-11778 and RM-11789

Secretary Dortch,

I am writing you to express our concerns about the petitions entered by CTIA and T-Mobile regarding the future use of the 3.5GHz radio band.

Blueriver Networking Services is a small fixed position wireless Internet service provider based in Salem, Indiana. We began offering service in 2003 and currently serve approximately 2000 customers across portions of five Southern Indiana counties using the unlicensed 900MHz, 2.4GHz and 5GHz bands. Our market area is a very rural one and as such, were it not for the service that we offer, many of our customers would have no access to higher speed Internet service at all.

We believe, based on our preliminary deployment and testing, that the 3.5GHz band will allow our company to increase our product offering and improve the quality of service currently available to the residents of our coverage area. This will be accomplished by the higher bandwidth and better propagation characteristics associated with the 3.5GHz band. As you are aware, 900MHz is of such limited bandwidth that it cannot offer the speeds required to deliver the services desired by most Internet users. The 2.4GHz and 5GHz bands, while able to offer higher speeds, are severely limited in their ability to deliver because of their line of sight dependency. Our early testing with the 3.5GHz band suggests that this band would overcome many of these limitations and allow customers in our rural market the opportunity to have access to the services that they require, and would allow small companies, such as ourselves, the opportunity to deliver said services in a cost effective and reliable manner.

As you also undoubtedly know, the economies of rural communities are particularly fragile. Blueriver Networking Services employs a dozen people from the area that we serve. Additionally, we support many other local businesses through our patronage of their goods and services as needed by our company. Finally, Blueriver also is a significant contributor to the local tax base through our property and payroll taxes. By accepting the changes as proposed in the CTIA and T-Mobile petitions, companies such as ours would be forced to accept an even smaller market share or to stop doing business altogether. This would without a doubt affect the local economies where such small companies operate, as the revenues that were once retained locally would now be extracted from those economies with very minimal reinvestment in the markets where the revenues originated.

Without dispute, Blueriver recognizes the congested nature of all the radio spectrum. However we feel that the proposed rules for governing the 3.5GHz spectrum as proposed in the CBRS outline, are reasonable and fair. They would all providers, large and small, the opportunity to compete fairly and provide consumers with choices in where they obtain their services. The 3.5GHz band would allow

small carriers to deploy in smaller market areas that the larger carriers apparently don't feel economically viable to construct facilities. Due to its propagation characteristics that permit better short range penetration of the dense tree foliage in our market as well as the higher data speeds that it allows, this seems to be the perfect vehicle for small companies such as ours to finally deliver quality services to remote areas in a cost effective manner. While companies such as ours can deploy this technology successfully on a micro level via utilization of grain elevators and small, commercially nonviable towers and obtain a high level of saturation to a rural market, larger companies, using only a small handful of towers in a county sized market, cannot. While 3.5GHz does show great promise for reaching the hard to get to customers, it is not a panacea. A few broadcast points, as is the model employed by the large carriers, in a market such as ours will not benefit the remote areas that are obstructed by vegetation and terrain. These are the customers who most need options and who have been continually overlooked by the large carriers. This is evidenced by the portion of our market which cannot even receive reliable cell service.

Currently Blueriver has only minimally invested in the 3.5GHz platform for research and testing purposes. However, at the time of this writing, we are preparing for a network wide deployment of this technology based on our test results and expect to have that in place within 60 days. This investment, while admittedly not large by comparison to what large carriers would invest, amounts to approximately 30% of our annual revenues. To have this investment obsoleted in the short term by adopting the recommendations in the CTIA and T-Mobile petitions would be a devastating financial blow for a company such as ours.

In closing, we respectfully request that the Commission reject the petitions of CTIA and T-Mobile and proceed with the implementation of CBRS rules as currently proposed. We believe that this would provide the most fair access to all parties interested in using the 3.5GHz band and ultimately will provide the best environment for consumers and local economies by not allowing yet another portion of valuable spectrum to be monopolized by a small handful of big players.

Your consideration in this matter is much appreciated.

Craig Brown CEO
Blueriver Networking Services, Inc.